



455 Golden Gate Ave., 10<sup>th</sup> Floor  
San Francisco, CA 94102  
Phone (415) 403-4920  
FAX (415) 703-5477

STATE OF CALIFORNIA  
DEPARTMENT OF INDUSTRIAL  
RELATIONS  
DIVISION OF APPRENTICESHIP  
STANDARDS

**AUDIT REPORT**  
**For**

**Pomona Valley Plumbers &  
Steamfitters JAC, File 03029**

*The Division of Apprenticeship Standards (DAS) creates  
opportunities for Californians to gain employable lifetime skills and  
provides employers with a highly skilled and experienced workforce  
while strengthening California's economy.*

## CONTENTS

|  |           |
|--|-----------|
| <b>Summary.....</b>                                  | <b>3</b>  |
| <b>Findings and Recommendations.....</b>             | <b>3</b>  |
| <b>Audit Highlights/Introduction/Background.....</b> | <b>4</b>  |
| <b>Scope/Focus/Methodology.....</b>                  | <b>5</b>  |
| <b>Audit Results and Recommendations.....</b>        | <b>6</b>  |
| <b>Comments from Program Sponsor.....</b>            | <b>16</b> |
| <b>Correction and Timeline.....</b>                  | <b>16</b> |
| <b>Remarks.....</b>                                  | <b>16</b> |

## **SUMMARY**

The Division of Apprenticeship Standards (DAS) presents its audit report concerning the Pomona Valley Plumbers and Steamfitters Joint Apprenticeship Committee (JAC) program; DAS file number 03029, (hereafter "Program"). The Pomona Valley Plumbers and Steamfitters Joint Apprenticeship Committee (JAC) was selected randomly by the DAS for an audit. The audit was performed during October 6, 2008 and was conducted pursuant to California Labor Code §3073.1.

During the initial preliminary audit preparation it was discovered that the actual number of registered apprentices reported to the DAS were not accurate. The number reported were 249 registered apprentices, when in fact the program actually only has 221 registered apprentices'. The program had requested withdraws and/or terminations for the remaining 28 registered apprentices' to the DAS and the cancellations were pending. Since the audit, the program and DAS took steps to correct the records.

## **FINDINGS AND RECOMMENDATIONS**

The program is complying with DAS requirements in keeping apprentices on schedule. The training facility and its instructor keep accurate records on class attendance and completion of Related Supplemental Instruction (RSI). Accurate records are in place to notify employers of apprentice upgrades and rate increases and apprentices are keeping continuously employed.

Detailed findings and recommendations are included in this report. The coordinator was presented with a summary of the findings and a recommendation was presented to assist him in preparing the appropriate corrective action. The DAS will visit the program in the future to verify compliance with the recommendations. These DAS audit procedures allow the program to respond to the recommendations and their response will become part of this formal report.

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## INTRODUCTION/BACKGROUND

### AUDIT HIGHLIGHTS.....

Our review of the Pomona Valley Plumbers and Steamfitters Joint Apprenticeship Committee (JAC) program; Division of Apprenticeship Standards (DAS) file number 03029, (hereafter "Program") found that:

- ☒ The program submitted a revision of standards August 2007.
- ☒ The program requires all apprentices to sign and confirm that they understand the programs Rules and Regulations. The apprentice files contained signed copies of this document.
- ☒ The program made requests to DAS to cancel or complete apprentices.
- ☒ The program files contained consistent verifiable OJT work hours. The apprentice is required to complete an Apprentice Record Book (blue book) to track work processes and OJT work hours. Work processes are consistent with program apprenticeship standards. All record of disciplinary actions due to poor work performance or excess absences are documented and found in apprentice file.

*Continued on next page...*

On October 6, 2008, the auditor met with key administrative personnel, examined records, observed administrative activities, conducted a walk-through of the training facility and visited a job site in connection with the audit. The Pomona Valley Plumbers and Steamfitters JAC operates as a Labor/Management Cooperative and the principal partners in the cooperative effort are the members of the Pomona Plumbers and Steamfitters United Association, Local 398. The program has an Apprentice Trust Fund. The programs funding mechanism comes from employer contributions, Related Supplemental Instructional (RSI) Funds and state prevailing wage training fund contributions.

The Daily operations, management and administrative functions are run by three primary staff, the Business Manager/Apprenticeship Coordinator, the Business Agent, and the office staff who use 20% of their time for apprenticeship, and 4 full time and 21 part-time Training Instructors. The program office is located at: 4959 Palo Verde, Suite 200C, Montclair, CA 91763

Employers are approved to train when they have completed an Agreement to Train Apprentices, DAS-7 form. The program indicated that they dispatch to both union signatory employers and non-union employers who agree to abide by the program's standards, rules, regulations and policies.

The apprenticeship program provides a training program for the following occupations:

Name of Occupation: Plumber  
Term of Apprenticeship: 7,500 hrs/ 60 mos.

Name of Occupation: Steamfitter  
Term of Apprenticeship: 7,500 hrs/ 60 mos.

Name of Occupation: Maintenance Plumber / Service & Repair  
Term of Apprenticeship: 7,500 hrs/ 60 mos.

Number of Total Apprentices: 249

The Related and Supplemental Instruction is provided by the programs training center which is at the same site as the program operations. Each apprentice enrolled receives a comprehensive orientation packet that includes the rules and regulations, an explanation of the program standards, the Apprentice Record book (blue book) and a class schedule. The Los Angeles Unified School district is the apprenticeship program's Local Education Agency (LEA).

- ☑ The job site review found that the apprentices are completing the OJT in the blue book.
- ☑ The program has completed and submitted the annually required Self-Assessment Review and Program Improvement Plan to DAS.
- ☑ The program committee meeting minutes include formalize motions to approve indentures, upgrades, prior credit, cancellations, completions, evaluations and discipline of apprentices.

## SCOPE AND FOCUS

The principal objectives of the audit are to ensure the program is complying with their standards, that all on-the-job training is performed by a journeyman, that all related and supplemental instruction required by the apprenticeship standards is being provided, that all work processes in the apprenticeship standards are being covered, and that graduates have completed the apprenticeship programs' requirements.

The audit focused on reviewing records and activities that tend to support and substantiate the programs' efforts, practices, system and capabilities to provide and deliver the on-the-job training and related instruction. The programs' policies and procedures and procedures were reviewed to determine if they support the programs' approved standards.

## METHODOLOGY

After completing an initial review of the programs' standards and records on file with the DAS, an audit plan was established with the following steps:

1. Notified the program 14 days in advance of our intent to audit.
2. Prepare an entrance interview
3. Organization of all working paper to conduct the interview
4. Confirm the location where records are maintained
5. Conduct a review of all apprentice files
6. Set the time and date of the meeting
7. Schedule inspection of the training facility and job sites
8. Request and review copies of the committee meeting minutes for the last 12 months.

All steps listed above were accomplished and include interviews with primary staff, apprentices and job site supervisors'.

## AUDIT RESULTS

### 1. STANDARDS

The objective is to determine whether the programs are submitting periodic revisions to their standards and if standards are reasonably current. "Standards" are a written document containing all terms and conditions for the qualification, recruitment, selection, employment and training, working conditions, wages, employee benefits and other compensation for apprentices. It may also include other provisions and statements. All apprenticeship programs are required to submit their apprenticeship standards to the DAS Chief for approval. The California Code of Regulations states the program must submit revisions to its standards when necessary.

#### ***(a) Findings***

- (1) Our review found that the program has submitted full revisions of standards to the DAS. The date of the last approved total revision was August 2007.

#### ***(b) Recommendations***

- (1) None

*Section 205 (f), 212 (a)(6) (7), (c)(2) (11) of the California Code of Regulations states that the program sponsor must submit revisions to its standards when necessary.*

### 2. RULES AND REGULATIONS

The objective is to determine if the programs have adequate rules and regulations, are implementing them as required, and provide a copy to the apprentices. The rules and regulations can be defined as an orientation or workshop session that explains the apprenticeship program standards and the operation of the apprenticeship program. It includes information on what is expected by both the program and the apprentice. When the apprentice is approved by the program to enter the training (passes an oral interview) he/she is given a copy of the rules and regulations and attends an orientation session with both the coordinator and educational instructor. Then the apprentice must sign the document indicating they have received, read and understood the rules and regulations.

### **(a) Findings**

(1) This review found that the apprentice files contained signed copies to show that the apprentice had received, read, and understood this document.

(2) The rules and regulations for this program were adopted and contain a policy statement showing responsibilities of the apprenticeship and the committee. Apprentices are cited for failure to follow the rules and regulations. A letter of citation is mailed to the apprentice to appear before the committee and failure to appear is reason to recommend cancellation from the program for failure to comply with a committee directive. The apprentice files contained copies of school absences, evaluations and progress.

(3) The apprentice files contained copies of citation letters.

(4) Program committee minutes for the last 12 months contain documentation of individual apprenticeship disciplinary actions.

### **(b) Recommendations**

(1) Continue to document disciplinary actions and file in individual apprentices' file.

*Section 3071, 3073, and Section 212 (a) (6) (7), (c) (2) (3) (8), (14) of the California Code of Regulations states that the program must establish rules and regulations that govern the program.*

## **3. ACTIVE APPRENTICES AND CANCELLATIONS**

The review of this item is to determine if the program is monitoring apprentices as they enter and proceed through the program. It is also to determine if the program is maintaining accurate records on both the active and cancelled apprentices. The program should have the ability to provide evidence of procedures used for periodic reviews and evaluation of the apprentice's progress in job performance and related instruction and maintenance of appropriate progress records. In addition, the program should have a process in place to notify the DAS when an apprentice leaves the program.

### **(a) Findings**

(1) During the initial preliminary audit preparation it was discovered that the actual numbers reported to the DAS were not accurate. The program had submitted cancellation and/or terminations to the DAS which were pending. Since the audit, the DAS has made the corrections in the database.

The program is monitoring the apprentice progress as they proceed through training by reviewing evaluations from the employer, training instructor and the apprenticeship coordinator.

### **(b) Recommendations**

(1) The program will continue to keep the DAS informed of indentures, cancellations and completions in a timely manner.

(2) The program should continue to monitor the apprentice progress in the program at least every 30 days.

(3) All changes affecting the status of the apprentices in the program must be submitted to the DAS.

*Section 205 (a)(1)(2) (i), 212 (a)(6) (7)(8), (b)(9), (c)(2)(10) 224 of the California Code of Regulations states that the program sponsor must maintain accurate apprenticeship records and submit changes, updates and revisions of an apprentice's status when necessary.*

## **4. ON -THE JOB TRAINING (OJT) PROGRESS RECORDS, ADVANCEMENTS AND EVALUATIONS**

Our review is to determine if apprentices are progressing on schedule, that the program is maintaining adequate OJT records, receiving periodic evaluations and if the program has an adequate records and a system in place to ensure that apprentices are covering all the work processes.

The program uses the following items to track apprentice's schedule, OJT records, periodic evaluations and work processes:

- The apprentice must abide by the requirements set by the program and the terms of the Collective Bargaining Agreement. Therefore, if the apprentice is not current in all fees and dues to the United Association of Plumbers, Pipefitters, Welders & Apprentices, Local 484, they will not progress to the next level of training.
- DAS Apprentice Record Book (blue book) to verify work processes and track work hours. The blue book must be signed by the employer before turning in the book to the program.
- School Evaluation form from the instructor and Apprentice Record of Absence or Late form (school attendance) to assure required supplemental instruction is complete. Each apprentice is also required to sign in and out daily on a sign in sheet provided by their instructor. The apprentice is required to skill level evaluation test at the end of each semester before progressing on to the next level of training and must maintain a "c" grade average or above.
- The employer provides work evaluations every six months and may contain work hours completed. The program will notify the employer and apprentice when advancements are earned insuring timely upgrades and employer being aware of proper rates of pay and benefits.



The program keeps copies of apprentices' blue book on record for each apprentice, however the program only tallies each individual work process in order to determine the amount of hours when the apprentice is due for advancement. The committee reviews each level change and the program keeps the date of change in the apprentice file.

- To keep the apprentice on schedule the program will send out written notices on class schedules, employer letters and evaluations. Apprentices failing to meet requirements are cited and notices are mailed with a request to explain why they should not be disciplined or terminated.

The program issues all newly indentured apprentices the DAS "Apprentice Record Book" (blue book) to record their daily work assignments. The apprentice is then required to turn-in this book before they are advanced to the next level of training and receive a wage increase. Our audit of the files found that all files review had copies of the blue book. All work processes listed on the book are consistent with the program standard and documented in apprentices' files.

#### **(a) Findings**

- (1) The apprentice files verified all work hours.
- (2) The review found evidence of disciplinary actions due to poor performance or excess absences. We also reviewed the programs committee minutes for the last 12 months and found evidenced of disciplinary actions and possible termination of apprentices.

#### **(b) Recommendations**

- (1) Continue to document all work hours and work processes and keep in apprentice individual file.
- (2) Keep a running tally of apprentices' total work hours in each individual apprentice file.

*Section 3073.1, 3076, 3078(e) of the Labor Code, and Sections 208, 210, 212(a) (4) (5) (7) (8), (b) (9), (c) (2) (6) (8) (9) (16) (18), of the California Code of Regulations. The program must offer training and supervision in all the work processes defined in its standards and has a system to ensure that apprentices cover all the work processes. The program must have a system of documenting and maintaining records that will assist in the review and evaluation of the apprentice's progress in job performance. The program must have a procedure for recording and maintaining accurate records, and a procedure for periodic review and evaluation of progress.*

## **5. RELATED AND SUPPLEMENTAL INSTRUCTION (RSI)**

The objective of our examination was to determine if apprentices are progressing on schedule, attending classes, covering the entire course of study, and to ensure the programs are maintaining accurate records with adequate systems in place to provide training.

The program has Related and Supplemental Instruction (RSI) and a Local Education Agency (LEA) which is the Los Angeles School District in Los Angeles, California. The program is assigned the oversight of the Related Training Curriculum in coordination with the Apprentice & Journeyman Training Trust Fund of the Southern California Plumbing and Piping Industry. The classroom training center is located at 223 South Rancho, Colton, CA 92324 .

The apprentice files included records of attendance, classroom hours, and evaluations/grade reports from the instructor. The apprentices will attend 108 hours of instruction and are scheduled each semester. Each student is issued a calendar with the schedule of classes. Apprentices in their first 2 years attend day classes- one 10 hour class every 2 weeks and all other apprentices attend evening classes, 2 nights per week for 4 hours. Day classes being promptly at 6:30 am to 4:30 pm, Evening classes begin from 5:45 pm to 9:15 pm.

Apprentices are required to sign in and out of class on a sign in sheet provided by their instructor. An apprentice may be absent for a total of 3 absences per semester. The program has several tracking systems in place that monitors the progress of the apprentices.

The apprentice files contained a consistent record of all absences related to school attendance. The program requires the apprentice to use a form for this purpose ("Apprentice Record of Absence or Late") form. This form is explained in the apprentice rules and regulations and is specific about "failure to complete this form and turn in the form will result in disciplinary action. The files also contained grade and completion reports from the instructor with a recommendation that the apprentice is ready for the next level in training.

### **(a) Findings**

(1)Our review found the program is doing a good job of monitoring the apprentice progression through the required supplemental instruction and is providing the appropriate courses for this occupation.

### **(b) Recommendation**

(1)Explore and continue to provide updates to the program and the apprentice(s) on how the apprentice(s) is progressing in their required educational courses. Review curriculum and develop new courses to cover additional needs when needed.

*Section 3073.2, 3078(d), of the California Labor Code, and Section 205(e)(h), 212(a)(3)(6)(7) (c)(13)(14) of the California Code of Regulations states that it is recommended that the program provide a minimum of 144 hours per year of supplemental instruction for each year of apprenticeship and adequate arrangements for related and supplemental instruction, and have the ability and commitment to train apprentices with current industry standard criteria.*

## **6. TRAINING CENTER**

The objective is to ensure the program has adequate facilities, tools, materials and equipment to train apprentices, and to determine if the facilities are utilized and adequate for training.

There are 25 certified instructors in this program. There are 4 full time instructors and 21 part time instructors. During our visit classes were not in session due to the end of school year period. The auditors spoke with the instructor who reviewed his records with us and toured the facility. The training center consists of 14 large classrooms and shop labs utilized for demonstrations and on-hand working booths to make special projects. Each apprentice must complete a variety of shop projects and show competency in applying the trade. The instruction is done with good health and safety practices in mind.

### **(a) Findings**

- (1) Our inspection of the training facility found it to be sufficient to train apprentices.

### **(b) Recommendation**

- (1) The program should continue current practices and insure plans for growth are based upon the current successful model.

*Section 3074 of the California Labor Code—Section 212(a) (3) (4) (8), (c) (13) (12), 212.3 of the California Code of Regulations states that the program sponsor must have adequate arrangements for related and supplemental instruction.*

## **7. MECHANISM TO KEEP APPRENTICES REASONABLY EMPLOYED**

Our objective is to determine if apprentices are kept reasonably employed, to ensure the program has adequate systems in place to rotate apprentices so they cover all work processes, and to provide apprentices with continuing employment in the event of a layoff.

The review found the program has an established system to keep apprentices reasonably employed and to provide them with continuing employment in the event of a layoff. Apprentices are dispatched from the List of Available Apprentice, whether he or she is an entry level apprentice or an unemployed indentured apprentice. All Job Placement will be through the Pomona Plumbers and Steamfitters United Association, Local 398 office and it is the apprentice responsibility to keep the office advised of any phone or address changes that may occur. It is also the responsibility of the apprentice to be current in all fees or dues to the Local 398 to be eligible for dispatch.

### **(a) Findings**

(1)The program has a process in place to send out apprentices to non-union employers. A request to dispatch apprentices to a Public Works Job, DAS 140 must be on file before a referral is made.

(2)The records found the referral/dispatch system keeps the apprentices employed within their industry. They are also referred to other employers, giving the apprentice an opportunity to train in all work processes.

### **(b) Recommendation**

(1)The program should continue the system they have in place and encourage additional employer involvement.

*Section 3080 of the Labor Code, and Section 212 (b) (7) (9), (c) (16) (18) of the California Code of Regulations. The program(s) must have a mechanism to keep apprentices reasonably employed and maintain accurate documentation Section 3080 of the Labor Code, and Section 212 (b) (7) (9), (c) (16) (18) of the California Code of Regulations.*

## 8. JOB SITE VISIT

A review of the job site offers an opportunity to view a job in progress, observe the work that is being done, and allows us to discuss the operation of the program with the apprentice. It enables direct contact with the apprentice to determine the following:

- If the apprentice is performing the various task listed within the work processes of their trade.
- If advancements are made on schedule.
- If the apprentice is receiving the correct pay and benefits.
- If the apprentice is kept employed on a reasonably continuous basis.
- If the programs' mechanism to keep apprentices reasonably employed is adequate.

The program suggested four job site locations to visit. Telephone calls were made to arrange a review of the job site and contact was made with one location.

The auditor visited Advance Mechanical Contractors, Inc at Pasadena City College and Pan Pacific at the City of Hope Hospital found five apprentices working under the supervision and direction of journeyman and were employed at task defined within the work processes of the program standards.

Interviews were conducted with two apprentices and found they have the equipment, materials and tools of the trade sufficient to train apprentices. Each apprentice receives proper pay and benefits and attends OJT classroom training. The interviews confirmed apprentices are advanced on schedule. We confirmed that each apprentice writes in the total hours of training in the apprentice record book, and both have a clear understanding on how to complete the work processes. The book is signed by the job site supervisor validating the work processes and OJT work hours. The interview with the supervisor confirmed there is a proper ratio of journeyman to apprentice and adequate supervision.

### **(a) Findings**

(1)The auditor found that apprentices are properly completing the blue OJT record book and documenting the work processes.

### **(b) Recommendations**

(1)The program should continue to monitor job sites ensuring apprentices are adequately employed at the work processes, recording OJT work hours, working under the direction of a journeyman, paid the proper wage rates and benefits.

*Section 208, 212(a) (1) (2) (4), (b) (4) (5) (6), (c) (6) (13) (14) of the California Code of Regulations states that all on-the-job training will be performed by journeymen, that all related and supplemental instruction required by the apprenticeship standards will be provided, that all work processes in the apprenticeship standards are being covered, and that graduates have completed the apprenticeship program's requirements.*

## **9. SELF-ASSESSMENT REVIEW AND PROGRAM IMPROVEMENT PLAN**

The objective is to determine if the program has submitted the annual Self-Assessment Review and Program Improvement Plan. The California Code of Regulations Title 8, Section 212.3 requires programs to perform an annual self-evaluation and to create an improvement plan. The DAS now requires that each program submit a copy of their Annual Self-Assessment Review and Program Improvement Plan to their apprenticeship consultant by December 1 of each year.

### **(a) Findings**

(1) The required annual Self-Assessment Review and Program Improvement Plan was submitted to the DAS for 2007 as required.

### **(b) Recommendations**

(1) Continue to submit the Self –Assessment Review and Program Improvement Plan as required by the DAS.

(2) Use the Self-Assessment and Program Improvement Plan as a tool for setting goals for your program and adapt the listed changes during the previous 12 month period.

*Section 212 (a) (6) (7), (c) (2) (11), 212.3 of the California Code of Regulations states that the program sponsor must submit annually a Self-Assessment Review and Program Improvement Plan to the DAS.*

## **10.COMMITTEE MEETINGS AND MINUTES OF MEETING**

Joint apprenticeship committees have equal representation from labor and from management. Each committee also includes a consultant representing the Division of Apprenticeship Standards or the Bureau of Apprenticeship and Training, U.S. Department of Labor. There is also an advisor from the local public school district and such other advisors and the apprenticeship consultant act without vote. This committee is responsible for administering the Standards for this program. In carrying out its functions, the committee has certain authority under the law. The actions, therefore, must be in accordance with approved apprenticeship standards and should be recorded in the minutes.

The objective is to determine if the apprenticeship committee is meeting on a regular basis, documenting actions, discussing and reviewing apprenticeship records, and making appropriate assessments and evaluations.

The committee provided the program meeting minutes for the past year. The meetings are held quarterly, unless more meetings are necessary to address certain issues. The frequency of the meetings was established and written in a trust document. As a reminder, a one week advance notice is sent out to all members and guest of the committee.

The programs rules and regulations state that this committee is a Labor/Management Co-Operative. Also noted in the rules and regulations are the three (3) Labor Trustees and three (3) Management Trustees. The committee also includes the apprenticeship coordinator and Local Education Agency Representative (LEA).

The program stated that all disciplinary actions must be reviewed by the committee.

### **(a) Findings**

(1) Committee minutes for the last 12 months found records of disciplinary actions, reviews assessments and evaluations of apprenticeship records. In addition the committee discusses and reviews apprenticeship records and makes appropriate assessment and evaluations.

### **(b) Recommendations**

(1) The program committee should continue to document all actions related to training the apprentices and evaluation of apprenticeship records.

*Section 3076, 3080(b), 3078(d)(f), 3079, 3093(k), of the California Labor Code, and Section 213, 218, 212(7), 208(5), 205(e)(f)(g)(i), 212(c)(1)(6) (9), 224 of the California Code of Regulations states that the program sponsor must maintain adequate documentation and records.*

## 11. COMMENTS FROM PROGRAM SPONSOR

Comments, if submitted by the program sponsor during the 14-day review and comment period, will be included with this report to the Chief of DAS and ultimately to the California Apprenticeship Council.

## 12. CORRECTIONS AND TIMELINE

The audit findings and recommendations are set forth in this report. The program has 14 days from the receipt of this report to review and submit comments on the report.

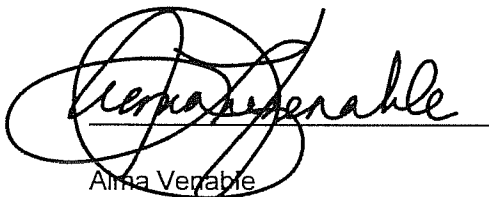
Within 10-days following the receipt of comments or the completion of the comment period, a final report will be submitted by the Chief of DAS to the California Apprenticeship Council.

The final report will detail the findings with recommendations for remedial actions. The programs must remedy all deficiencies and be in full compliance with their apprenticeship standards. The programs must notify the DAS in writing when deficiencies have been remedied. A DAS representative will schedule an appointment to review the completion of the remedial actions. Failure to comply may be grounds for withdrawing state approval of the apprenticeship programs.

## 13. REMARKS

The results of this audit do not modify, replace or negate other duties and requirements or any previous notices you may have received regarding the fulfilling of your obligations prior to or after the audit period. In addition, law changes or new rulings might result in different findings in future audits.

Respectfully submitted by,



Alma Vergara  
Apprenticeship Consultant Auditor  
DAS, Los Angeles District Office

01-08-2009

Date



**From:** Ray LeVangie, Jr.  
**To:** Alma Venable;  
**Subject:** Re: DAS Audit Report- Pomona Valley Plumbers & Steamfitters JAC File #3029  
**Date:** Thursday, January 15, 2009 12:41:35 PM

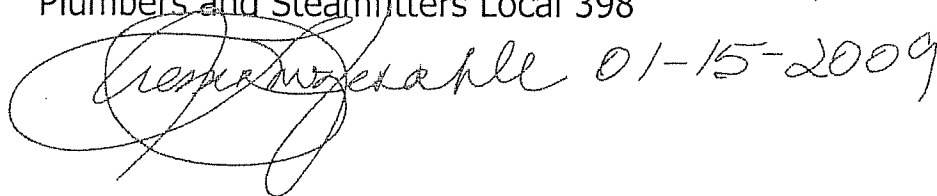
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Alma:

We reviewed the DAS Audit Report you mailed to our office and it looks fine to us. It was a pleasure working with you. We will continue to work closely with our DAS Consultant, Bill Bathurst in order to comply with DAS rules and regulations.

If you have any questions, please contact us.

Ray LeVangie, Jr.  
Business Manager  
Plumbers and Steamfitters Local 398

A handwritten signature in cursive script, likely of Ray LeVangie, Jr., followed by the date "01-15-2009". The signature is written over the printed name and title.

Jan 8, 2009 07:38:17 PM, [AVenable@dir.ca.gov](mailto:AVenable@dir.ca.gov) wrote:

John Sherman and Ray LeVangie:

The audit of the Pomona Valley Plumbers & Steamfitters JAC File # 3029, conducted in accordance with the provisions of the State of California Labor Code Section 3073.1, is complete. The audit resulted in the findings and/or deficiencies noted in the preliminary audit report.

The audit, findings and recommendations, and careful examination of your apprenticeship program, are outlined in the report attached to this email. A copy of this report has also been sent to you via regular mail. The program now has 14 days from the receipt of this email in which to review and submit comments on the report. Within 10 days of the close of your comment period a final report will be submitted to the California Apprenticeship Council. The final report will detail the findings with recommendations for the

remedial action.

At the time of the audit you were informed of the audit procedures and informally presented with a brief overview of audit findings and/or deficiencies. If you have any questions regarding the report, please contact me for assistance. If there are any formal comments you wish to make, please submit them in writing to me either via email or the address below, so that I may forward them to the Chief/DAS along with the report for his review and recommendations.

The results of this audit do not rescind or replace other duties and requirements or any previous notices you may have regarding the fulfilling of your obligations prior to or after the audit period. Also, law changes or new rulings may result in different findings for future audits. Please feel free to call on us any time we can be of service.

You may contact me at the Los Angeles office at (213)576-7750, or my cell phone at (213) 598-5716 or by Email at [www.avenable@dir.ca.gov](mailto:www.avenable@dir.ca.gov)

Thank you both for your assistance and cooperation during the audit.

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Sincerely,



*Apprenticeship Consultant*

*Audit Unit*

Picture (Device  
Independent Bitmap)